

**Nevada Division of Environmental Protection  
Chemical Accident Prevention Program  
Element Audit Checklist**



<b>Facility:</b>	<b>Process(es) Covered:</b>	<b>Date:</b>	
<b>XII. CONTRACTOR PROGRAM</b>			
<b>A. PROCEDURE/POLICY REVIEW</b>			
<b>1) EXISTENCE OF EFFECTIVE CONTRACTOR PROGRAM</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>	
i. Does a written Contractor Program procedure and implementation records indicate that the program is being implemented pursuant to CAPP requirements? (all requirements of sections 2 through 4 must be met)	459.95435		
<b>Notes/Comments Pertaining to Responses to Questions under Issue 1):</b>			
<b>2) FACILITY RESPONSIBILITIES</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>	
i. Does the program procedure require that information be obtained and evaluated regarding a contractor's on-going safety performance and programs? <i>(Does it include what is reviewed, by whom and the acceptance criteria?)</i>	459.95435(1a)		
ii. Does the program procedure require that the facility inform contractor of known potential fire, explosion or toxic release hazards in the pertinent areas of the facility? <i>(Does it include what is reviewed, how it is reviewed and by whom?)</i>	459.95435(1b)		
iii. Does the program procedure require that the facility inform contractor of applicable provisions of the facility's Emergency Action Plan or Emergency Response Plan? <i>(Does it include what is reviewed, how it is reviewed and by whom?)</i>	459.95435(1c)		
iv. Does the program procedure require that the facility's safe work practices be implemented by the contractor? <i>(Does it include which safe work practices are reviewed with the contractor, how they are reviewed and by whom?)</i>	459.95435(1d)		
v. Does the program procedure require that facility staff routinely evaluate the contractor's performance in fulfilling the following obligations: <i>(Does it include frequency, what is reviewed, by whom and the acceptance criteria?)</i>	459.95435(1e)		
1. Instructing contractor employees in tasks necessary to perform their job safely;	459.95435(1e)		
2. Instructing contractor employees in the known fire, explosion or toxic release hazards related to the job;	459.95435(1e)		
3. Instructing contractor employees in the applicable portions of the emergency response or emergency action plan; and	459.95435(1e)		
4. Instructing contractor employees in the facility safety rules, including safe work practices?	459.95435(1e)		



<b>Notes/Comments Pertaining to Responses to Questions under Issue 2):</b>		
<b>3) CONTRACTOR RESPONSIBILITIES</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
i. Does the program procedure require the contractor to:		
1. Instruct their employees in tasks necessary to perform their job safely;	459.95435(2a)	
2. Instruct their employees in the known fire, explosion or toxic release hazards related to the job;	459.95435(2b1)	
3. Instruct their employees in the applicable portions of the emergency response or emergency action plan;	459.95435(2b2)	
4. Instruct their employees in the facility safety rules, including facility safe work practices (Hot work, Lockout/Tagout, Confined Space, Linebreaking, Controlled Access); and	459.95435(2e)	
5. Instruct their employees to advise supervisor or facility personnel of any hazards identified?	459.95435(2f)	
ii. Does the program procedure require the contractor to:		
1. Document that contract employees have received and understood the training required pursuant to question i above; and	459.95435(2c)	
2. Ensure the training documentation includes name, date of training and test with results?	459.95435(2d)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 3):</b>		
<b>4) VERIFICATION OF PROGRAM IMPLEMENTATION</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
i. Do the contractor files reviewed indicate facility compliance with the contractor program? <i>Refer to Part B1</i>	459.95435	
ii. Is the facility in compliance with the contractor program for the contractors on site at the time of the inspection? <i>Refer to Part B2</i>	459.95435	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 5):</b>		



**General Procedure/Policy Review Notes/Comments:**



<b>B. ON-SITE INSPECTION - RECORDS AUDIT</b>						
<b>1) SELECT 1 TO 4 CONTRACTOR FILES/RECORDS TO REVIEW (include contractors presently on site)</b> LIST ON THE FOLLOWING TABLE:						
#	Contractor Name	Services Provided & Processes Where the Services are Rendered	Time in Facility			
i						
ii						
iii						
iv						
Inquiry/Observation			Resp. Code:			
			i	ii	iii	iv
a. Is there a record of the facility obtaining and evaluating a contractor's on-going safety performance and programs?						
b. Is there a record of the facility informing the contractor of known potential fire, explosion or toxic release hazards in the pertinent areas of the facility?						
c. Is there a record of the facility informing the contractor of the applicable provisions of the facility's Emergency Action Plan or Emergency Response Plan?						
d. Is there a record of the facility providing and reviewing the facility safe work practices with the contractor?						
e. Is there a record of the facility auditing the contractor's performance in the following obligations:						
1. Instructing contractor employees in tasks necessary to perform their job safely;						
2. Instructing contractor employees in the known fire, explosion or toxic release hazards related to the job;						
3. Instructing contractor employees in the applicable portions of the emergency response or emergency action plan; and						
4. Instructing contractor employees in the facility safety rules, including safe work practices?						
f. Did the facility audit indicate that the contractor was fulfilling their obligations?						
g. If the contractor was not fulfilling their obligations, is there evidence that the facility took steps to correct the situation?						
h. Based upon the response codes used to complete items a through g above, is it possible to confirm that the contractor program is being implemented in accordance with the regulation?						



**Notes/Comments Pertaining to Responses to Questions under Issue 1):**

**2) REVIEW OF CONTRACTOR PERSONNEL ON-SITE IN PROCESS AREA(S)**

**Resp.  
Code**

a. Are contractor activities occurring in covered process areas at the time of the inspection?

b. Is the facility in compliance with contractor requirements for any contractor currently on site?

**Notes/Comments Pertaining to Responses to Questions under Issue 2):**

**General On-Site Inspection and Records Audit Notes/Comments:**



<b>C. INTERVIEWS</b>	
<b>1) SELECT TWO OR MORE CONTRACTOR PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVENESS OF THE CONTRACTOR PROGRAM USING THE FOLLOWING QUESTION SETS.</b> (RESPONSES ARE TO BE LOGGED ON FOLLOWING PAGES.)	
<b>Question Set</b>	<b>Question Options/Phrasing</b>
<b>a</b>	What is your job description and associated tasks?
<b>b</b>	Were you informed of known potential hazards in the work area, such as fire, explosion or toxic releases? What personnel protective equipment must you have in your possession?
<b>c</b>	Were you informed on how to recognize an actual incident? How do you report an incident or accident? What have you been told regarding possible evacuation to a safe location? How do you report any safety hazards you may discover?
<b>d</b>	Have you been instructed in the facility's Hot Work permit procedure? (Lock-Out/Tag-Out, Confined Space Entry, Linebreaking, Controlled Access)?



<b>C. INTERVIEWS</b>			
<b>2) RECORD RESPONSES OF SELECTED OPERATING OR MAINTENANCE PERSONNEL TO QUESTIONS FROM THE QUESTION SETS (LISTED ON THE FIRST PAGE OF SECTION C)</b>			
<b>Employee Profile</b>			
Job Title/Position	Department/Unit/Group	Time in Job	Time w/Co.
Response to Question Set _:			
Response to Question Set _:			
Response to Question Set _:			
Response to Question Set _:			